



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

~~CONTAINS CONFIDENTIAL BUSINESS INFORMATION~~

DP Barcode No.: D450666 File Symbol No.: 93923-E Decision No.: 547701
PC Code: 128931 Company Name: Hy-Green LLC
Food Use: Yes Action Code: R 300 Product Name: Dicamba Diglycolamine Salt SL

DATE OUT: February 26, 2019

SUBJECT: End-Use Product Chemistry Review
Product Name: Dicamba Diglycolamine Salt SL

FROM: Bruce F. Kitchens, Chemist
Product Chemistry Team
Chemistry, Inerts and Toxicology Assessment Branch/RD (7505P)

TO: RM #23, Kathryn V. Montague/Sarah Meadows
Herbicide Branch
Registration Division (7505P)

INTRODUCTION:

The registrant, Hy-Green LLC, is applying to register the proposed end-use product, Dicamba Diglycolamine Salt SL. The active ingredient in this product is Dicamba diglycolamine salt at a label nominal concentration of 57.56% a.i. This product is intended for use as an herbicide end-use product. In addition, the registrant states that the proposed product is identical or substantially similar in composition to EPA Reg. No. 19713-687. In support of this request, the registrant is submitting a proposed basic Confidential Statement of Formula (CSF) dated 31 Dec 2018; a draft label and product chemistry data contained in MRID#s 507423-01, -02 and -03. The Chemistry, Inerts and Toxicology Assessment Branch (CITAB) has been asked to review this submission.

SUMMARY OF FINDINGS:

1. Name of Active Ingredient: Dicamba diglycolamine salt (57.56% a.i.)
2. Has the registrant claimed substantial similarity to a registered product?
[X] Yes; [] No; [] NA; if yes give the registration number of the cited product.
EPA Reg. No. 19713-687
3. All of the source materials of the active ingredient are derived from registered sources- [X] Yes [] No
4. All inert ingredients have been screened by IIAB and are approved for the proposed labeled uses.

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5. Confidential Statement of Formula:

[X] Basic - Dated: 31 Dec 2018 Resubmitted Dated:
[] Alternate – Dated: N/A Resubmitted Dated:

Alternate CSF complies with 40 CFR 152.43

[] Yes [] No [X] NA

6. Product label

- a. Ingredient statement: Nominal concentration of AI listed on CSF concurs with product label (PR Notice 91-2).

[X] Yes, if not, explain below:

Is the sub statement in compliance with PR Notice 97-6 (inert ingredient vs other ingredient)?

[X] Yes; [] No; if not, explain below

Metallic equivalent: [] Yes [X] NA
Soluble arsenic: [] Yes [X] NA
Isomeric ratios: [] Yes [X] NA
Acid Equivalent: [] Yes [X] NA

- b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: [] Yes; [] No; [X] NA
Methanol at > 4%: [] Yes; [] No; [X] NA
Sodium nitrate/sodium nitrite [] Yes; [] No; [X] NA

- c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for flammability, explosive potential or electric insulator breakdown?

[] Yes [X] No

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?

[] Yes; [] No; [X] NA; if not, explain below

- d. Label requires an additional Storage and Disposal statement: [] Yes [X] No; if yes explain below

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7. Group A: Product Chemistry Data

CITAB's determination of the acceptability for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		CITAB's Assessment of Data	MRID Nos.
			Yes	No		
830.1550	Product Identity & Composition		X		A	507423-01
830.1600	Description of materials used to produce the product		X		A	507423-01
830.1650	Description of formulation process		X		A	507423-01
830.1670	Discussion on the formation of impurities		X		A	507423-01
830.1700	Preliminary analysis			X	N/A	
830.1750	Certified limits (158.350)	Standard certified limits	X		A	see basic csf 12/31/18
		Proposed Limits				
		Justification for wider limits				
830.1800	Enforcement analytical method		X		A	507423-02

A = Acceptable, N = Not Acceptable, G = Data Gap, W = Waiver Request, I = In Progress, NA = Not Applicable; U = Upgradeable.

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8. Group B:

Guideline No.	Study Title	Value or Qualitative Description	CITAB's Assessment of Data	MRID Nos.
830.6303	Physical State	The test substance is a honey yellow liquid with a foul odor.	A	507423-02
830.6314	Oxidation/Reduction	The test substance is compatible when mixed with water, ammonium phosphate, kerosene and iron powder. The test substance is not compatible when mixed with potassium permanganate.	A	507423-02
830.6315	Flammability	Flash point - 96.6°C	A	507423-02
830.6316	Explodability	This product does not contain explosive components.	W	507423-03
830.6317	Storage stability	The test substance's active content remained stable after 14-days storage at 54 ± 2°C.	A	507423-02
830.6320	Corrosion Characteristics	The appearance of the test substance and the test container remained unchanged after 14-days storage at 54 ± 2°C.	A	507423-02
830.7000	pH	7.73 @ 24.7°C	A	507423-02
830.7100	Viscosity	39.60 mPa·s @ 19.9°C 17.64 mPa·s @ 40°C	A	507423-02
830.7300	Density (units)	1.23 @ 20°C	A	507423-02

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CONCLUSIONS:

CITAB has reviewed the product chemistry data submitted for the proposed end-use product and has concluded that:

A. Substantial similarity to the cited product (Reg. No. 19713-687) from Product chemistry view point

- ☒ Similar
- ☐ Not similar, give reasons
- ☐ Identical
- ☐ Not identical
- ☐ Not applicable

B. Confidential Statement of formula

1. Basic CSF (dated 31 Dec 2018)

- ☒ Acceptable
- ☐ Not Acceptable
- ☐ Not Applicable

If not acceptable provide the reasons

2. Alternate CSF

- ☐ Acceptable
- ☐ Not Acceptable
- ☒ Not Applicable

If not acceptable give reasons

C. Group A Product Chemistry Data

- ☒ Acceptable
- ☐ Not acceptable
- ☐ Acceptable with the exception of Guideline(s): (provide the guideline number & explain)
- ☐ Not required
- ☐ Data cited

D. Group B Product chemistry data

- ☒ Acceptable
- ☐ Not acceptable
- ☐ Acceptable with the exception of Guideline(s): (provide the guideline number & explain)
- ☐ Not required
- ☐ Data cited

Waiver requests were included in MRID# 507462-03. These requests have been evaluated and waived based on the registrant's submitted rationale.

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E. Product Label/Draft Label

Recommendations – Yes [X]; No []

If yes, give recommendations below:

During testing, it was determined that the proposed product is not compatible with oxidizing agents. The following statement must be added to the label under physical and chemical hazards:

"Do mix or allow contact with oxidizing agents. Hazardous chemical reaction may occur."

Note: Please add additional remarks if necessary for each section

